

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of the Joint Application of)	
)	
Lavaca Telephone Company, Inc., <i>Transferor</i>)	WC Docket No. 20-_____
)	
and)	
)	
Dobson Technologies, Inc., <i>Transferee</i>)	
)	
for Grant of Authority Pursuant to Section 214)	
of the Communications Act of 1934, as)	
amended, and Section 63.04 of the)	
Commission's Rules to Transfer Control of)	
Domestic Section 214 Authorization Holders to)	
Dobson Technologies, Inc.)	
)	

**JOINT APPLICATION FOR TRANSFER OF CONTROL
OF DOMESTIC BLANKET SECTION 214 AUTHORIZATION**

Lavaca Telephone Company, Inc., d/b/a Pinnacle Communications ("Lavaca" or "Transferor") and Dobson Technologies, Inc. ("Dobson" or "Transferee") (together "Applicants") pursuant to Section 214 of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 214, and Sections 63.04 of the Commission's Rules, 47 C.F.R. §§ 63.04, request Commission approval for Transferee to acquire ownership and control of Lavaca (the "Transaction") which will result in the transfer of direct or indirect control to Transferee of Lavaca's Blanket Domestic Section 214 authority and the following subsidiaries that are also Blanket Domestic Section 214 authority holders: Pinnacle Telecom, LLC ("Pinnacle") and Vantage Telecom LLC d/b/a Pinnacle Telecom ("Vantage") (Pinnacle, Vantage and Lavaca – collectively the "Licensees").

As discussed in more detail below, the Applicants have entered into an agreement where-by Dobson will acquire all of the equity interests in Lavaca and, indirectly, its subsidiaries, including the minority shares in Vantage held by third parties. The Transaction will not result in any loss or

impairment of service for any of the Licensees' customers and will have no adverse effects upon competition in any areas where Lavaca and its subsidiaries provides communications service. Indeed, as a result of the proposed Transaction, Lavaca will gain access to the financial resources and management expertise of Dobson and its officers and directors who collectively have decades of experience in the telecommunications business. The Executive Chairman of Dobson is Everett R. Dobson who founded Dobson Communications Corporation and was its Executive Chairman when it sold to AT&T in November 2007 for \$5.1 billion. Consequently, the Commission should find that the change in the ownership of Lavaca and its subsidiaries will serve the public interest.

In accordance with the requirements of Section 63.04(a) of the Commission's Rules, the Applicants submit the following information:

I. DESCRIPTION OF THE APPLICANTS

A. Transferee – Dobson Technologies Inc.

Dobson is an Oklahoma-based, privately-owned telephony company. Through its wholly owned subsidiaries, Dobson owns and operates a 4,000-mile fiber optic network in Oklahoma/Texas along with an ILEC operation and provides connectivity services to businesses, carriers and other wholesale providers, including broadband internet, data and cloud connectivity, and voice over internet telephone solutions. Dobson's subsidiary, Dobson Telephone Company ("Dobson Telephone") serves exchanges in western and eastern Oklahoma including Taloga, Leedey, Cheyenne, Erick, Reydon, Camargo, Roger Mills, Vici, McLoud, Newalla, Sweetwater, and Stella. Dobson has another subsidiary, Dobson Technologies – Transport and Telecom Solutions, LLC ("Dobson Transport") that provides fiber-based CLEC services in Oklahoma and Texas and offers a full range of data connectivity and voice solutions to its customers.

The Executive Chairman of Dobson is Everett R. Dobson who founded Dobson Communications Corporation and was its Executive Chairman when it sold to AT&T in November

2007 for \$5.1 billion. At the time of the sale to AT&T, the company was operating in 17 states, producing \$1.6 billion in revenue, had 3,000 employees and 1.6 million subscribers.

B. Lavaca and its Subsidiaries.

Lavaca Telephone Company, Inc., d/b/a Pinnacle Communications is an incumbent local exchange carrier (“ILEC”) that provides local exchange and exchange access services in (1) the Lavaca exchange in rural western Arkansas and (2) the Panama/Shady Point exchange in rural eastern Oklahoma. Lavaca’s wholly owned subsidiary Pinnacle Telecom, LLC is authorized to provide telecommunications services, including local exchange and toll services, throughout the State of Arkansas in areas it has obtained interconnection agreements and throughout the State of Oklahoma limited initially to the service territories of Southwestern Bell Telephone Company, d/b/a AT&T Oklahoma and Valor Communications of Texas, LP d/b/a Windstream Communications Southwest.

Pinnacle holds a 51 percent membership interest in Vantage Telecom LLC, an Arkansas limited liability company, providing interstate interexchange and exchange access services as a CLEC in the states of Arkansas and Oklahoma (as well as wholesale telecommunications services in Missouri) pursuant to a blanket Domestic Section 214 authorization.

II. DESCRIPTION OF THE TRANSACTION

Pursuant to the Equity Interest Purchase Agreement (the “Agreement”), dated November 6, 2020, by and among Dobson, the shareholders of Lavaca Telephone Co., Inc., d/b/a Pinnacle Communications and the Members of Vantage Telecom LLC d/b/a Pinnacle Telecom, as Sellers, and Lavaca Telephone Co., Inc., d/b/a Pinnacle Communications, Vantage Telecom LLC d/b/a Pinnacle Telecom, and Pinnacle Telecom L.L.C., (as Acquired Companies), Dobson will acquire all of the outstanding equity interests in the Acquired Companies (the “Transaction”) including the membership interests in Vantage not currently held by Pinnacle.. As a result, Lavaca will become a direct, wholly owned subsidiary of Dobson. Pinnacle and Vantage will remain subsidiaries of Lavaca and, therefore, will become indirect subsidiaries of Dobson and Vantage will be wholly controlled by

Pinnacle and indirectly by Dobson. Diagrams depicting the pre- and post-Transaction corporate ownership structures are provide as **Exhibit A**.

III. INFORMATION REQUIRED BY SECTION 63.04

Pursuant to Commission Rule 63.04(a), 47 C.F.R. § 63.04(a), Applicants must submit the following information in support of their request for domestic Section 214 authority to transfer indirect control of Licensees to Dobson as specified in Commission Rule 63.04(a):

(1) Name, address and telephone number of each Applicant:

Transferee:

Dobson Technologies, Inc.
14101 Wireless Way, Suite 300
Oklahoma City, OK 73134
Telephone: 405-242-0343
Facsimile: 405-242-0340

FRN: 0011595204

Transferor:

Lavaca Telephone Company Inc.
Pinnacle Telecom LLC
Vantage Telecom LLC
301 Hwy 96 SW (P.O. Box 230)
Lavaca, AR 72941
Telephone: 479-674-2104
Facsimile: 479-674-5810

FRN: 0004283917

FRN: 0008699340

FRN: 0006772412

(2) Government, state or territory under the laws of which each corporate or partnership applicant is organized:

Lavaca Telephone Company Inc. is an Arkansas corporation.

Dobson Technologies, Inc.is an Oklahoma corporation.

Pinnacle LLC is an Arkansas limited liability company.

Vantage LLC is an Arkansas limited liability company.

(3) Name, title, post office address, and telephone number of the officer or contact person to whom correspondence concerning the application is to be addressed:

For Transferee:

Joshua M. Bobeck
JiaZhen (Ivon) Guo
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Ave. NW
Washington, DC 20004
Tel: 202-739-3000
Fax: 202-739-3001
joshua.bobek@morganlewis.com
ivon.guo@morganlewis.com

For Transferor and Licensees:

Ron Comingdeer
Crowe & Dunlevy
324 N. Robinson, Suite 100
Oklahoma City, Oklahoma 73102
Tel: 405-848-5534
Fax: 405-272-5263
ron.comingdeer@crowedunlvey.com

With a copy to:

Jim Horsburgh
Dobson Technologies, Inc.
14101 Wireless Way, Suite 300
Oklahoma City, OK 73134
Phone: 405-242-0343
jhorsburgh@dobson.net

Keith Gibson
Pinnacle Communications
5015 Cliff Drive
Ft. Smith, AR 72903
Phone: 479-650-4410
keithg@pinncom.com

(4) Name, address, citizenship and principal business of any person or entity that directly owns at least ten (10) percent of the equity of the applicant, and the percentage of equity owned by each of those entities:

(a) Pre-Transaction ownership of Lavaca and Subsidiaries

The name, address, citizenship and principal business of the entities that currently hold at least ten (10) percent of the equity and voting power of Vantage Telecom LLC are:

1. Name: Pinnacle Telecom LLC
 - a. Jurisdiction of Formation: USA (Arkansas)
 - b. Address: 301 Hwy 96 SW, Lavaca, AR 72941
 - c. Principal Business: Telecommunications
 - d. Interest Held: 51.12% equity/voting
2. Name: James Larry Bone
 - a. Citizenship: USA (Texas)
 - b. Address: 6607 York St. , Ft. Worth, TX 76132
 - c. Principal Business: Retiree
 - d. Interest Held: 15.85% equity/voting

No other individual or entity directly or indirectly owns or controls an interest of ten (10) percent or more of the equity and voting power of Vantage Telecom, LLC.

The sole current member of **Pinnacle Telecom LLC** is:

3. Name: Lavaca Telephone Company, Inc.
 - a. Jurisdiction of Formation: USA (Arkansas)
 - b. Address: 301 Hwy 96 SW, Lavaca, AR 72941
 - c. Principal Business: Telecommunications
 - d. Interest Held: 100% equity/voting direct in Pinnacle (51.12% indirect in Vantage)

The name, address, citizenship and principal business of the current ten (10) percent or greater shareholders of **Lavaca Telephone Company, Inc.** are:

4. Name: Michael Keith Gibson Trust
 - a. Jurisdiction of Formation: USA (Arkansas)
 - b. Address: 301 Hwy 96 SW, Lavaca, AR 72941
 - c. Principal Business: Trust
 - d. Interest Held: 19.63% equity/voting direct in Lavaca (10.01% indirect in Vantage)
5. Name: The Gibson Family Trust, Richard D. Gibson, Trustee
 - a. Jurisdiction of Formation: USA (Arkansas)
 - b. Address: 301 Hwy 96 SW, Lavaca, AR 72941
 - c. Principal Business: Trust
 - d. Interest Held: 19.63% equity/voting direct in Lavaca (10.01% indirect in Vantage)
6. Name: Gregory N. Gibson
 - a. Citizenship: USA (Arkansas)
 - b. Address: 301 Hwy 96 SW, Lavaca, AR 72941
 - c. Principal Business: Individual Investor
 - d. Interest Held: 19.63% equity/voting direct in Lavaca (10.01% indirect in Vantage)
7. Name: Tammy Nolan Trust, Tammy J. Nolan, Trustee
 - a. Jurisdiction of Formation: USA (Arkansas)
 - b. Address: 301 Hwy 96 SW, Lavaca, AR 72941
 - c. Principal Business: Trust
 - d. Interest Held: 19.63% equity/voting direct in Lavaca (10.01% indirect in Vantage)
8. Name: Ruby Jo Gibson Living Trust, Ruby Jo Gibson, Trustee
 - a. Jurisdiction of Formation: USA (Arkansas)
 - b. Address: 301 Hwy 96 SW, Lavaca, AR 72941
 - c. Principal Business: Trust
 - d. Interest Held: 10.74% equity/voting direct in Lavaca (5.48% indirect in Vantage)
9. Name: ByPass/QSST Trust, c/u Clyde M. Gibson Living Trust, Ruby Jo Gibson, Trustee
 - a. Jurisdiction of Formation: USA (Arkansas)
 - b. Address: 301 Hwy 96 SW, Lavaca, AR 72941
 - c. Principal Business: Trust
 - d. Interest Held: 10.74% equity/voting direct in Lavaca (5.48% indirect in Vantage)

Ruby Jo Gibson is the mother of Michael K. Gibson, Richard D. Gibson, Gregory N. Gibson and Tammy J. Nolan. Ruby Jo Gibson is the widow of Clyde M. Gibson.

No other individual or entity directly or indirectly owns or controls an interest of ten (10) percent or more of the equity and voting power of Lavaca.

(b) Post-Closing Ownership of Licensees

Upon closing the Transaction, the sole member of **Vantage** will be:

1. Name: Pinnacle Telecom LLC
 - a. Jurisdiction of Formation: USA (Arkansas)
 - b. Address: 301 Hwy 96 SW, Lavaca, AR 72941
 - c. Principal Business: Telecommunications
 - d. Interest Held: 100% equity/voting

Upon closing the Transaction, the sole member of **Pinnacle** will be:

2. Name: Lavaca Telephone Company, Inc.
 - a. Jurisdiction of Formation: USA (Arkansas)
 - b. Address: 301 Hwy 96 SW, Lavaca, AR 72941
 - c. Principal Business: Telecommunications
 - d. Interest Held: 100% equity/voting direct in Pinnacle (100% indirect in Vantage)

Upon closing the Transaction, the sole shareholder of **Lavaca** will be:

3. Name: Dobson Technologies, Inc.
 - a. Jurisdiction of Formation: USA (Oklahoma)
 - b. Address: 14101 Wireless Way, Ste 300, Oklahoma City, OK 73134
 - c. Principal Business: Family Office
 - d. Interest Held: 100% equity/voting direct in Pinnacle (100% indirect in Vantage)

The name, address, citizenship and principal business of the ten (10) percent or greater shareholders of **Dobson** are:

4. Name: Dobson CC, L.P.
 - a. Jurisdiction of Formation: USA (Oklahoma)
 - b. Address: 14101 Wireless Way, Ste 300, Oklahoma City, OK 73134
 - c. Principal Business: Family Office
 - d. Interest Held: 77.12% equity/100% voting - indirect (as 77.12% shareholder in Dobson Technologies, Inc.)
5. Name: Eight Bar Financial Partners I, L.P.
 - a. Jurisdiction of Formation: Cayman Islands
 - b. Address: 335 Wahackme R, New Canaan, CT 06840
 - c. Principal Business: Investment Company
 - d. Interest Held: 22.88% Equity Indirect (as 22.88% shareholder in Dobson Technologies, Inc.)

The name, address, citizenship and principal business of the ten (10) percent or greater indirect interest holders of Dobson through their partnership interest in Dobson CC, L.P. are:

6. Name: Stephen Dobson
 - a. Citizenship: USA
 - b. Address: 14101 Wireless Way, Ste 300, Oklahoma City, OK 73134
 - c. Principal Business: Individual investor
 - d. Interest Held: 29.78% indirect equity (as 38.61% limited partner in Dobson CC, L.P.)
7. Name: Everett Dobson
 - a. Citizenship: USA
 - b. Address: 14101 Wireless Way, Ste 300, Oklahoma City, OK 73134
 - c. Principal Business: Individual investor
 - d. Interest Held: 38.94% indirect equity (as 50.49% limited partner in Dobson CC, L.P. and sole shareholder in RLD Inc.)
8. Name: RLD, Inc.
 - a. Jurisdiction of Formation: USA (Oklahoma)
 - b. Address: 14101 Wireless Way, Ste 300, Oklahoma City, OK 73134
 - c. Principal Business: Investment Company
 - d. Interest Held: 100% indirect voting/1% indirect equity (as General Partner in Dobson CC, L.P. with 1% equity interest)

No other partner of Dobson CC L.P. has a ten (10) % or greater indirect equity or voting interest in Dobson.

Eight Bar Financial Partners I, L.P. has a General Partner and one limited partner with a 10% or greater indirect equity interest in Dobson. The General partner is:

9. Eight Bar Financial Partners GP, L.P.
 - a. Jurisdiction of Formation: Cayman Islands
 - b. Address: 27 Hospital Road, George Town Grand Cayman
 - c. Principal Business: Investment Company
 - d. Interest Held: 22.88% Voting Indirect (as General Partner of Eight Bar Financial Partners I, L.P.)
10. Eight Bar Partners HC, Inc.
 - a. Jurisdiction of Formation: USA (Delaware)
 - b. Address: 335 Wahackme R, New Canaan, CT 06840
 - c. Principal Business: Investment Company
 - d. Interest Held: 22.88% Voting Indirect (as General Partner of Eight Bar Financial Partners GP, L.P.)
11. Thomas E. Doster IV
 - a. Citizenship: USA
 - b. Address: 335 Wahackme R, New Canaan, CT 06840
 - c. Principal Business: Individual
 - d. Interest Held: 22.88% voting Indirect (as 100% shareholder of Eight Bar Partners HC, Inc. and sole limited partner of Eight Bar Financial Partners GP, L.P.) and 0.23% Equity Indirect (as 1% LP of Eight Bar Financial Partners I, L.P.)

The sole limited partner in Eight Bar Financial Partners I, L.P. with a 10% or greater indirect equity interest in Dobson is:

12. Name: Collier Partners 701 LP Incorporated (“CP 701”)
 - a. Jurisdiction of Formation: Guernsey
 - b. Address: Trafalgar Court, Les Banques, St. Peter’s Port, GY1 SQL, Guernsey
 - c. Principal Business: Investment Company
 - d. Interest Held: 22.65% Equity Indirect (as 99% limited partner in Eight Bar Financial Partners I, L.P.)

The only entities with a 10% or greater indirect interest in Dobson by virtue of an interest in Collier Partners 701 LP Incorporated are:

13. Name: CIP VII Holdings SPV, L.P. Incorporated (“Holdings SPV”)
 - a. Jurisdiction of Formation: Guernsey
 - b. Address: Trafalgar Court, Les Banques, St. Peter’s Port, Channel Islands, GY1 3QL, Guernsey
 - c. Principal Business: Investment Company
 - d. Interest Held: 22.65% indirect equity (as sole limited partner of CP 701)
14. Name: CIP VII Pooling SPV, L.P. Incorporated (“Pooling SPV”)
 - a. Jurisdiction of Formation: Guernsey
 - b. Address: Trafalgar Court, Les Banques, St. Peter’s Port, Channel Islands, GY1 3QL, Guernsey
 - c. Principal Business: Investment Company
 - d. Interest Held: 22.65% indirect equity (as sole limited partner of Holdings SPV)

The only entity with a 10% or greater indirect interest in Dobson by virtue of an interest in Pooling SPV is:

15. Name: Collier International Partners VII L.P. (CIP VII)
 - a. Jurisdiction of Formation: Guernsey
 - b. Address: Trafalgar Court, Les Banques, St. Peter’s Port, Channel Islands, GY1 3QL, Guernsey
 - c. Principal Business: Investment Company
 - d. Interest Held: 21.10% indirect equity (as 93.19% limited partner of Pooling SPV)

No other partner of Pooling SPV has a ten (10) % or greater indirect equity interest in Dobson and none of the limited partners of CIP VII have a ten (10) % or greater indirect equity interest in Dobson.

Moreover, no other partner of Eight Bar Financial Partners I, L.P. has a ten (10) % or greater indirect equity or voting interest in Dobson. Further, neither CP 701 nor any other partner of Eight Bar Financial Partners I, L.P., other than its general partner Eight Bar Financial Partners GP, L.P. has *de facto* control over Eight Bar Financial Partners I, L.P., an investment fund which is controlled by its sole general partner. Therefore, neither CP 701 nor any entity with an interest in CP 701 can indirectly exert *de facto* control over the 22.88% interest in Dobson held by Eight Bar Financial Partners I, L.P.

To the best of Dobson's knowledge, no other entity or individual has a direct or indirect equity or voting interest in Dobson Technologies, Inc. and upon closing the transaction, in Lavaca, Pinnacle or Vantage.

(5) Certification pursuant to 47 C.F.R. §§1.2001 through 1.2003 that no party to the application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

Applicants certify, pursuant to 47 C.F.R. §§1.2001 through 1.2003, that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

(6) Description of the transaction:

A description of the proposed Transaction is set forth in Section II above.

(7) Description of the geographic areas in which the transferor and transferee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area:

(a) Areas and Services of Dobson Technologies Inc.

Dobson's subsidiary Dobson Telephone provides local exchange service and exchange access services as an ILEC (approximately 7,291 access lines) in the portions of the following Oklahoma counties: Roger Mills, Dewey, Custer, Beckham, Oklahoma, Lincoln, Pottawatomie and Cleveland. Dobson also provides competitive local exchange service, exchange access service, long distance and broadband internet service, both retail and wholesale, as a CLEC to less than a thousand customers primarily around the state of Oklahoma and northern Texas. Dobson's subsidiary Dobson Transport holds authorizations to provide CLEC services from the Oklahoma Corporation Commission.

Dobson Telephone serves the following ILEC exchanges: Camargo, Oklahoma (580-926); Cheyenne, OK (580-497); Erick, Oklahoma (580-526); Leedey, Oklahoma (580-488); Reydon, Oklahoma (580-655); Roger Mills, Oklahoma (580-983); Sweetwater, Oklahoma (580-534), West Sweetwater, Oklahoma (806-754); Taloga, Oklahoma (580-328); Vici, Oklahoma (580-955); West Roger Mills (806-988); West Reydon, Oklahoma (806-565); McLoud, Oklahoma (405-964); Newalla, Oklahoma (405-391); and Stella, Oklahoma (405-386).

Dobson Transport serves the following CLEC exchanges: Ada, Oklahoma (580-495); Arcadia, Oklahoma (405-233); Ardmore, Oklahoma (580-850); Bethany, Oklahoma (405-384); Binger, Oklahoma (405-656); Britton, Oklahoma (405-242); Burns Flat, Oklahoma (580-562); Canute, Oklahoma (580-457); Cashion, Oklahoma (405-433); Chickasha, Oklahoma (405-892); Clinton, Oklahoma (580-500); Durant, Oklahoma (580-853); Edmond, Oklahoma (405-471); El Reno, Oklahoma (405-276); Elk City, Oklahoma (580-339); Elk City, Oklahoma (580-374); Guthrie, Oklahoma (405-346); Harrah, Oklahoma (405-309); Hobart, Oklahoma (580-726); Luther, Oklahoma (405-349); Meridian, Oklahoma (405-586); Midwest City, Oklahoma (405-731); Minco, Oklahoma (405-369); Howe, Oklahoma (918-983); Moore, Oklahoma (405-800); Mustang, Oklahoma (405-806); Nicoma Park, Oklahoma (405-807); Noble, Oklahoma (405-355); Norman, Oklahoma (405-801); Oklahoma City, Oklahoma (405-548); Oklahoma City, Oklahoma (405-628); Piedmont, Oklahoma (405-283); Pocasset, Oklahoma (405-459); Poteau, Oklahoma (918-974); Sayre, Oklahoma (580-729); Shawnee, Oklahoma (405-765); Spencer, Oklahoma (405-771); Tuttle, Oklahoma (405-362); Weatherford, Oklahoma (580-375); Wellston, Oklahoma (405-356); Wheatland, Oklahoma (405-357); Wister, Oklahoma (539-785); and Yukon, Oklahoma (405-578).

(b) Areas and Services of Lavaca Telephone Company and Affiliates

Lavaca Telephone Company, Inc. provides local exchange service and exchange access service as an incumbent local exchange carrier (“ILEC”), with approximately 1,748 access lines in and around the communities of Lavaca in Sebastian County, Arkansas; and the community of Panama/Shady Point in LeFlore County, Oklahoma. Lavaca serves the following exchanges: Lavaca, Arkansas (479-674) and Panama/Shady Point, Oklahoma (918-963).

(c) Areas and Services of Pinnacle Telecom LLC

Pinnacle Telecom, LLC (“Pinnacle”) is a competitive local exchange company (“CLEC”) and was granted a Certificate of Public Convenience and Necessity to provide telecommunications services, including local exchange and toll services, throughout the State of Arkansas in areas it has

obtained interconnection agreements and throughout the State of Oklahoma limited initially to the service territories of Southwestern Bell Telephone Company, d/b/a AT&T Oklahoma and Valor Communications of Texas, LP d/b/a Windstream Communications Southwest. Pinnacle currently does not provide services to any customers.

(d) Areas and Services of Vantage Telecom LLC d/b/a Pinnacle Telecom

Vantage provides competitive local exchange service, exchange access service, long distance service and broadband and dial-up internet service, both retail and wholesale, as a CLEC (approximately 1,200 access lines) in and around the communities of Alma, Bentonville, Eureka Springs, Fayetteville, Fort Smith, Ozark, Paris, Rogers, Springdale and Van Buren in Benton, Carroll, Crawford, Franklin, Logan, Sebastian and Washington Counties of western Arkansas; and the communities of Fort Gibson, Hulbert, Muskogee, Poteau, Sallisaw and Tahlequah in the counties of Cherokee, LeFlore, Muskogee, Sequoyah and Wagoner in eastern Oklahoma. Vantage also provides wholesale voice and other telecommunications services to certain retail telecommunications service providers in and around the communities of Clarksville, Van Buren and Fort Smith, in Crawford, Johnson and Sebastian Counties in Arkansas, in and around the community of Hulbert in Cherokee County in Oklahoma Country and in Cassville, Exeter, Seligman and Washburn in Barry County in south central Missouri. Vantage serves the following CLEC exchanges: Ozark, Arkansas (thousands block 479-213-9); Rogers, Arkansas (479-230); Fort Smith, Arkansas (479-242); Bentonville, Arkansas (479-245); Charleston (thousands block 479-275-1); Eureka Springs, Arkansas (479-302); Springdale, Arkansas (479-303); Alma, Arkansas (thousands block 479-312-1); Greenwood, Arkansas (thousands block 479-322-5); Russellville, Arkansas (thousands block 479-324-1); Fayetteville, Arkansas (479-455); Siloam Springs, Arkansas (thousands block 479-599-1); Clarksville, Arkansas (thousands block 479-774-6); Paris, Arkansas (thousands block 479-847-3); Booneville, Arkansas (thousands block 479-849-1); Van Buren, Arkansas (479-922); Fort Gibson,

Oklahoma (thousands block 918-400-1); Tahlequah, Oklahoma (918-414); Sallisaw, Oklahoma (918-790); and Muskogee, Oklahoma (918-912).

(8) Statement as to how the application fits into one or more of the presumptive streamlined categories in section 63.03 or why it is otherwise appropriate for streamlined treatment:

The Applicants request streamlined treatment of the proposed transfer of control pursuant to Section 63.03 of the Commission's rules, 47 C.F.R. § 63.03. While Lavaca is an independent ILEC, it only serves approximately 1,748 access lines. Dobson provides only limited services in Lavaca's ILEC service territory, providing fiber to the tower to a Commercial Mobile Radio Services carrier at a single cell site in Lavaca's ILEC market. Upon closing of the Transaction Dobson's market share in the interstate, interexchange market will be far below 10 percent; and together with Lavaca, Pinnacle and Vantage will serve far less than two (2) percent of the nation's subscriber lines.

(9) Identification of all other Commission applications related to the same transaction:

Vantage Telecom, LLC d/b/a Pinnacle Telecom was granted Microwave Industrial/ Business Pool private carrier licenses for stations WRDJ536, WRDJ537 and WRDJ538 on May 14, 2019. An application to transfer indirect control of these licenses was submitted on November 19, 2020 in File No. 0009304384.

(10) Statement of whether the applicants are requesting special consideration because either party to the transaction is facing imminent business failure:

No.

(11) Identification of any separately filed waiver requests being sought in conjunction with the transaction:

None.

(12) Statement showing how grant of the application will serve the public interest, convenience and necessity, including any additional information that may be necessary to show the effect of the proposed transaction on competition in domestic markets:

Approval of this Application and the proposed Transaction is consistent with the public interest. Lavaca and its Subsidiaries have a long history of providing wireline telecommunications services and broadband internet service to customers in rural areas of Arkansas, Oklahoma and Missouri. The Applicants anticipate that the Transaction will enable Lavaca and its Subsidiaries to continue to expand its fiber network.

In addition, the Transaction will be seamless to customers and will not affect any of the operations or legal identities of Lavaca or its Subsidiaries. After the transfer of control to Dobson, Lavaca and its Subsidiaries will continue to provide high-quality communications services under the Pinnacle brand name on reasonable terms and conditions to customers, and there will be no interruption of service.

Specifically, the Transaction will have no adverse impact on the customers or operations of Lavaca and its Subsidiaries, as upon closing of the Transaction, the Licensees will continue to provide service at the same rates, terms, and conditions, as governed by existing tariffs and contracts, which are subject to change in the ordinary course of business. Future changes, if any, in rates, terms and conditions of service will be made in accordance with applicable rules and notice requirements.

The Licensees will continue to serve customers under their existing blanket domestic authorizations. The Transaction will be transparent to customers. The Licensees entities and service provider trade names will remain intact immediately upon closing, and the only change immediately following the closing from a customer's perspective will be the new ownership of the Licensees. Dobson further expects that existing management will continue to oversee Lavaca and its Subsidiaries on a day-to-day basis. Additionally, Transferee expects that the Transaction will provide

Lavaca and its Subsidiaries additional scale that will allow for greater access to capital that will make them stronger competitors.

Finally, the proposed transaction will yield affirmative public interest benefits by allowing for the continued provision of high-quality communications services to customers of Lavaca and its subsidiaries. Transferee and its affiliates are experienced in the provision of fiber-based rural telecommunications services, and will efficiently integrate management of Lavaca, Pinnacle and Dobson into ongoing operations. Further, Transferee is geographically in a strategic location by virtue of its proximity to Lavaca's exchanges which will allow for operational efficiencies. Local repair and maintenance personnel will be maintained, enabling customers to enjoy a seamless transition in ownership, without disruption or interruptions in service. The transaction will not adversely affect subscribers, competitors or the market for the provision of telecommunications services.

Lastly, the Transaction will enhance not diminish competition. As explained above, Dobson serves a single cell site in Lavaca's ILEC territory. In the markets served by Lavaca's CLEC affiliates Pinnacle and Vantage, Dobson has fiber facilities in Poteau and Muskogee. While Dobson and Pinnacle both operate as competitive carriers and serve customers in Poteau, there are other competitive suppliers of wireline services, including Windstream and Suddenlink as well as a wireless ISP, 360 Communications. Further in Muskogee, Oklahoma, Dobson serves a single customer and both Dobson and Pinnacle face competition from AT&T and Suddenlink.

IV. Conclusion

In light of the foregoing facts and public interest considerations, Applicants respectfully request approval of the transfer of control of the blanket Domestic Section 214 authorizations held by Lavaca Telephone Company, Inc., Pinnacle Telecom, LLC and Vantage Telecom LLC to Dobson Technologies Inc.

Respectfully submitted,

/s/ Joshua M. Bobeck

Joshua M. Bobeck
JiaZhen (Ivon) Guo
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Ave. NW
Washington, DC 20004
Tel: 202-739-3000
Fax: 202-739-3001
joshua.bobeck@morganlewis.com
ivon.guo@morganlewis.com

Counsel for Dobson Technologies, Inc.

/s/ Ron Comingdeer

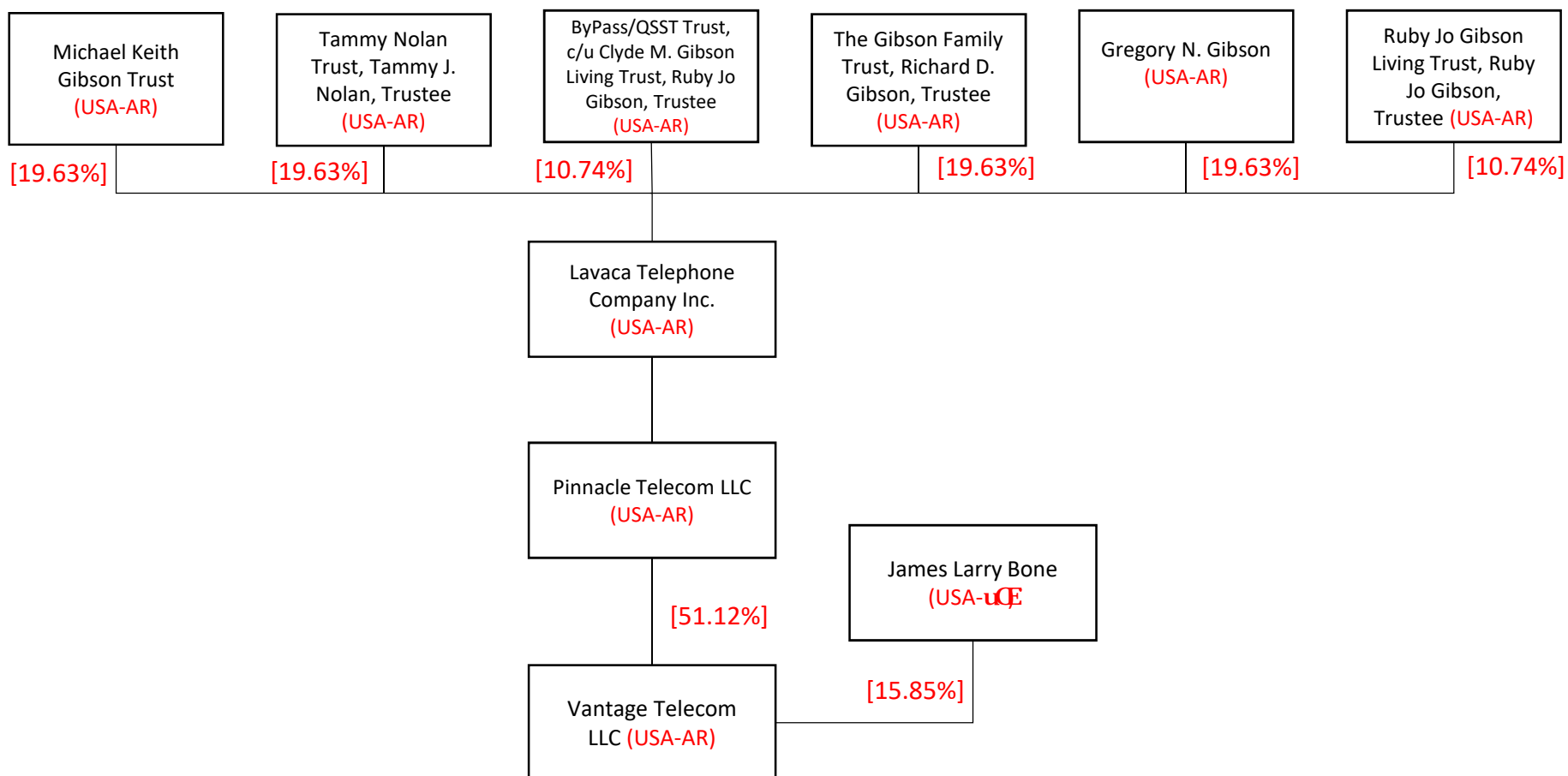
Ron Comingdeer
Crowe & Dunlevy
324 N. Robinson, Suite 100
Oklahoma City, Oklahoma 73102
Tel: 405-848-5534
Fax: 405-272-5263
ron.comingdeer@crowedunlvey.com

*Counsel for Lavaca Telephone
Company, Inc., d/b/a Pinnacle
Communications, Pinnacle Telecom,
LLC and Vantage Telecom, LLC*

Dated: November 20, 2020

EXHIBIT A

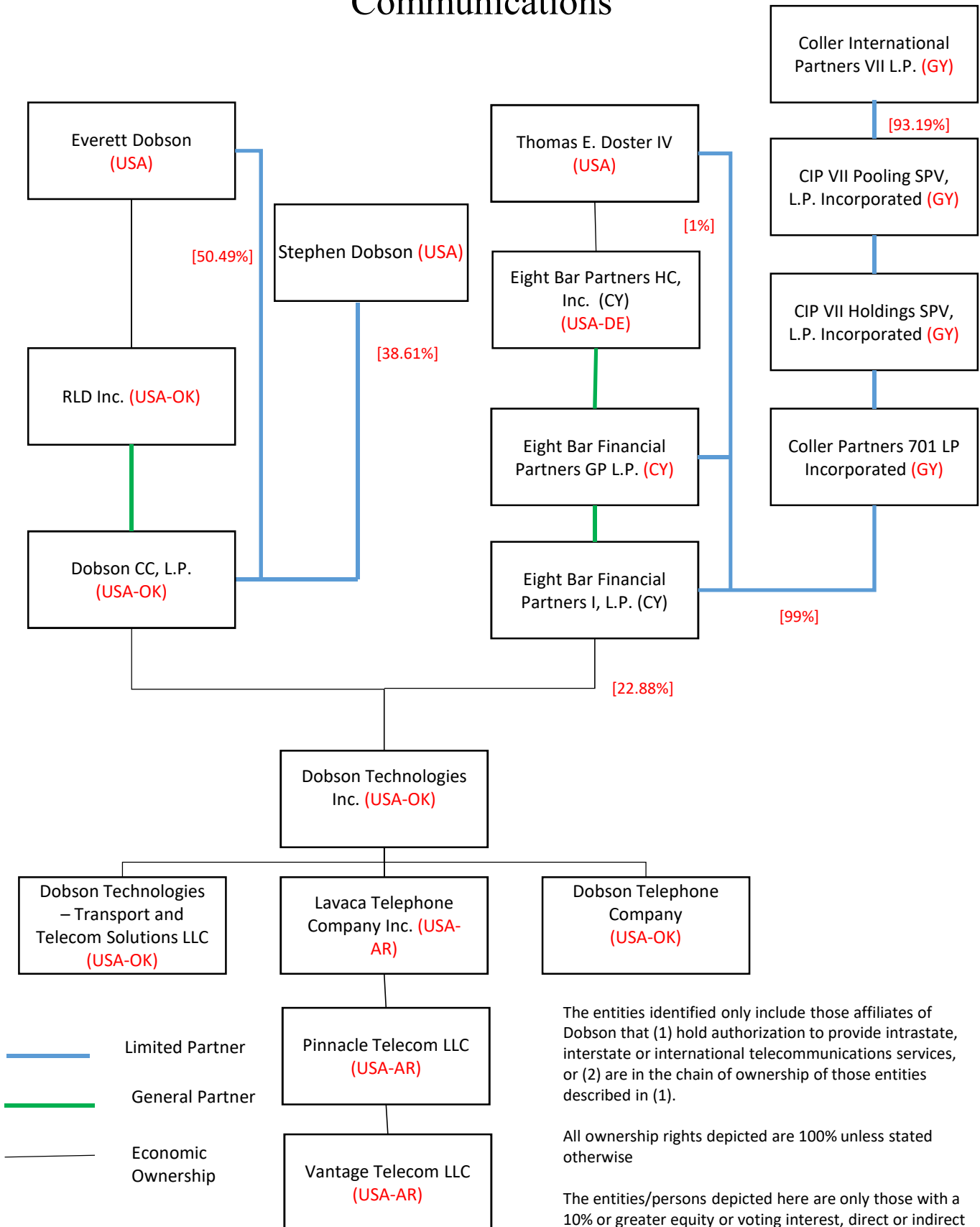
Pre-Transaction Corporate Structure of Lavaca Telephone Company, Inc. D/B/A Pinnacle Communications



All ownership is 100% unless stated otherwise

The entities/persons depicted here are only those with a 10% or greater equity or voting interest, direct or indirect in authorization holders.

Post-Transaction Corporate Structure of Lavaca Telephone Company, Inc. D/B/A Pinnacle Communications



VERIFICATIONS

VERIFICATION

I, Michael K. Gibson, state that I am President Lavaca Telephone Company, Inc. d/b/a Pinnacle Communications (the "Company"); that I am authorized to make this Verification on behalf of the Company and its subsidiaries Pinnacle Telecom LLC and Vantage Telecom LLC; that the foregoing filing was prepared under my direction and supervision; and that the contents thereof and the certifications contained therein regarding the Company and its subsidiaries are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: November 18, 2020

A handwritten signature in cursive script that reads "Michael K. Gibson". The signature is written in dark ink and is positioned above a horizontal line.

Name: Michael K. Gibson

Title: President

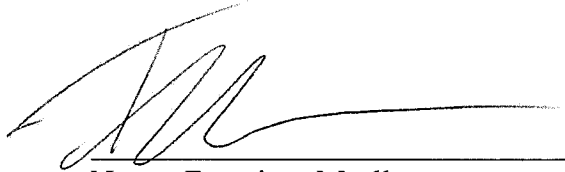
Lavaca Telephone Company, Inc. d/b/a Pinnacle
Communications

VERIFICATION

I, Francisco Maella, state that I am Chief Executive Officer of Dobson Technologies, Inc. (the "Company"); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents thereof and the certifications contained therein regarding the Company and its subsidiaries are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: November 17, 2020

A handwritten signature in black ink, appearing to be 'F. Maella', is written over a horizontal line.

Name: Francisco Maella
Title: Chief Executive Officer
Dobson Technologies, Inc.